

Items outstanding in Plaintiffs' First Demands, and Defendants' objections thereto:

**Demand 1(m).**

All documents shared between members of the SCPD concerning this incident including but not limited to e-mails, letters, documents, transcripts, interview notes, witness statements, photographs, reports, and test results;

**Response 1(m).**

Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the foregoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

**Demand 1(n).**

All documents, audio or video recordings, notes, memoranda, and reports relating to discussions, interrogations, interviews with, or statements taken from, any witnesses, potential witnesses, or informants at any time in the investigation, whether or not under oath, including polygraph tests and its data and results;

**Response 1(n).**

Objection on grounds of New York Civil Rights Law §50-a, relevance and materiality. Notwithstanding the foregoing objections, and while fully preserving same, a copy of the Internal Affairs Bureau report will be produced upon its completion, pursuant to a stipulated order of confidentiality.

**Demand 1(s).**

All time sheets and log books for January 23, 2013, for the SCPD Seventh Precinct, patrol division, Detective Squad, and all commanding officers and administrative/civilian employees, including ledger books reflecting arrival and departure from the precinct;

**Response 1(s).**

To be provided.

**Demand 1(u).**

Photographs of all SCPD employees who came into contact with either Jack Franqui IV or Simon Earl on January 23, 2013;

**Response 1(u).**

Objections on the grounds of relevance and materiality

**Demand 1(v).**

Photographs of all SCPD employees who came into contact with Jack Franqui IV or John Burke at the Seventh Precinct on January 23, 2013;

**Response 1(v).**

Objections on the grounds of relevance and materiality

**Demand 5.**

Produce all logbooks, rosters of names, and employee sign-in sheets for all employees assigned to the SCPD Seventh Precinct on January 23, 2013.

**Response 5.**

Objection on [g]rounds of relevance, materiality, and redundancy.

**Demand 8.**

Produce all documents reflecting SCPD rules and regulations regarding minimal temperatures that are required to be maintained in a SCPD precinct holding cell area.

**Response 8.**

To be provided.

**Demand 9.**

Produce all documents indicating the temperatures of the SCPD Seventh Precinct holding cell area on January 23, 2013, including but not limited to maintenance logbooks.

**Response 9.**

Objection on grounds of relevance and materiality.

**Demand 25.**

Produce any and all insurance policies in your name, including all policies covering the SCPD and its employees, whether or not you believe the policy to cover the acts and omissions alleged in this lawsuit.

**Response 25.**

On information and belief, none exist at this time.